Case 4:22-md-03047-YGR Document 1712 Filed 02/21/25 Page 1 of 6

DEFENDANTS: UNOPPOSED ADMINISTRATIVE MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY

1	Pursuant to Civil Local Rules 7-11 and 7-3(d), Defendants Snap Inc.; Meta Platforms, Inc.
2	f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments,
3	Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; Mark Elliot Zuckerberg;
4	TikTok Inc.; ByteDance Inc.; ByteDance Ltd.; TikTok Ltd.; TikTok LLC; YouTube, LLC; and
5	Google LLC (collectively referred to hereinafter as the "Defendants") submit this Unopposed
6	Administrative Motion for Leave to File Supplemental Authority to bring to the Court's attention
7	a recent published opinion by the Ninth Circuit, Doe v. Grinder Inc., F.4th, No. 24-475,
8	2025 WL 517817 (9th Cir. Feb. 18, 2025). Defendants submit <i>Doe</i> in support of the arguments
9	regarding Section 230 of the Communications Decency Act raised in Defendants' Joint Motion to
10	Dismiss Pursuant to Rule 12(b)(6) Plaintiffs' Non-Priority Claims (ECF No. 516), Defendant Snap
11	Inc.'s Motion to Dismiss Pursuant to Rule 12(b)(6) Counts 12 and 14 Asserted in Plaintiffs' D.H.,
12	K.S., and Alice Doe's Amended Short Form Complaints (ECF No. 533), and Defendants
13	YouTube, LLC, Google LLC, and Snap Inc.'s Supplemental Motion to Certify for Interlocutory
14	Appeal Under 28 U.S.C. § 1292(b) (ECF No. 1462). A copy of <i>Doe</i> , which was issued after the
15	completion of briefing and argument on the motions listed above, is attached as Exhibit A.
16	Respectfully submitted,
17	Dated: February 21, 2025 WILSON SONSINI GOODRICH & ROSATI
18	Professional Corporation
19	/s/ Brian M. Willen Brian M. Willen, pro hac vice
20	Wilson Sonsini Goodrich & Rosati bwillen@wsgr.com
21	1301 Avenue of the Americas, 40th Floor New York, New York 10019
22	Telephone: (212) 999-5800 Facsimile: (212) 999-5899
23	Lauren Gallo White (State Bar No. 309075)
24	Wilson Sonsini Goodrich & Rosati lwhite@wsgr.com
25	Andrew Kramer (State Bar No. 321574) akramer@wsgr. com
26	Carmen Sobczak (State Bar No. 342569) csobczak@wsgr. com
27	One Market Plaza, Spear Tower, Suite 3300 San Francisco, CA 94105

1	Telephone: (415) 947-2000 Facsimile: (415) 947-2099
2	
3	Christopher Chiou (State Bar No. 233587) Wilson Sonsini Goodrich & Rosati
4	cchiou@wsgr.com Matthew K. Donohue (State Bar No. 302144)
5	mdonohue@wsgr.com 633 West Fifth Street
6	Los Angeles, CA 90071-2048 Telephone: (323) 210-2900
7	Facsimile: (866) 974-7329
8	MORGAN, LEWIS & BOCKIUS LLP
	/s/ Yardena R. Zwang Weissman
9	Yardena R. Zwang-Weissman (SBN 247111) yardena.zwang-weissman@morganlewis.com
10	300 South Grand Avenue, 22nd Floor
11	Los Angeles, CA 90071-3132 Telephone: (213) 612-7238
12	Brian Ercole (pro hac vice)
12	brian.ercole@morganlewis.com
13	600 Brickell Avenue, Suite 1600
14	Miami, FL 33131-3075 Telephone: (305) 415-3416
15	Stephanie Schuster (pro hac vice)
	Stephanie.schuster@morganlewis.com
16	1111 Pennsylvania Avenue NW
17	Washington, DC 20004-2541 Telephone: (202) 373-6595
18	WILLIAMS & CONNOLLY LLP
19	/s/ Joseph G. Petrosinelli
20	Joseph G. Petrosinelli jpetrosinelli@wc.com
	Ashley W. Hardin
21	ahardin@wc.com
22	680 Maine Avenue, SW Washington, DC 20024
23	Telephone.: (202) 434-5000
	Facsimile: (202) 434-5029
24	Attorneys for Defendants YouTube, LLC, and Google LLC
25	una Google LLC
26	
27	COVINGTON & BURLING LLP
28	

- 1	
1	/s/ Mark W. Mosier
2	Mark W. Mosier, pro hac vice
	mmosier@cov.com Paul W. Schmidt, <i>pro hac vice</i>
3	pschmidt@cov.com
4	Phyllis A. Jones, pro hac vice
7	pajones@cov.com COVINGTON & BURLING LLP
5	One CityCenter 850 Tenth Street, NW
6	Washington, DC 20001-4956 Telephone: (202) 662-6000
	Facsimile: (202) 662-6291
7	
8	Emily Johnson Henn (State Bar No. 269482) ehenn@cov.com
	COVINGTON & BURLING LLP
9	3000 El Camino Real 5 Palo Alto Square,
10	10th Floor Palo Alto, CA 94306
	Telephone: (650) 632-4700
11	Facsimile: (650) 632-4800
12	Attorneys for Defendants Meta Platforms, Inc. f/k/a
12	Facebook, Inc.; Facebook Holdings, LLC;
13	Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram,
14	LLC; Siculus, Inc.; and Mark Elliot Zuckerberg
15	
15	KING & SPALDING LLP
15 16	
	/s/ Geoffrey M. Drake
16 17	/s/ Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com
16	/s/ Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice
16 17	
16 17 18 19	
16 17 18 19 20	/s/ Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521
16 17 18 19	
16 17 18 19 20	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100
16 17 18 19 20 21 22	Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com
16 17 18 19 20 21	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP
16 17 18 19 20 21 22	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601
16 17 18 19 20 21 22 23 24	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601 Telephone: (212) 556-2100
16 17 18 19 20 21 22 23 24 25	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601
16 17 18 19 20 21 22 23 24	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601 Telephone: (212) 556-2100
16 17 18 19 20 21 22 23 24 25	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601 Telephone: (212) 556-2100
16 17 18 19 20 21 22 23 24 25 26	Geoffrey M. Drake Geoffrey M. Drake, pro hac vice gdrake@kslaw.com TaCara D. Harris, pro hac vice tharris@kslaw.com King & Spalding LLP 1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-3521 Telephone: (404) 572-4600 Facsimile: (404) 572-5100 Kristen R. Fournier, pro hac vice kfournier@kslaw.com King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601 Telephone: (212) 556-2100

- 1	
1	David P. Mattern, pro hac vice
2	dmattern@kslaw.com King & Spalding LLP
3	1700 Pennsylvania Avenue, NW, Suite 900 Washington, DC 20006-4707
	Telephone: (202) 737-0500
4	Facsimile: (202) 626-3737
5	Bailey J. Langner (SBN 307753) blangner@kslaw.com
6	King & Spalding LLP 50 California Street, Suite 3300
7	San Francisco, CA 94111 Telephone: (415) 318-1200
8	Facsimile: (415) 318-1300
9	Attorneys for Defendants TikTok Inc., ByteDance
10	Inc., TikTok Ltd., ByteDance Ltd., and TikTok LLC
11	MUNGER, TOLLES & OLSON LLP
12	
13	/s/ Jonathan H. Blavin Jonathan H. Blavin (State Bar No. 230269)
	Jonathan.Blavin@mto.com
14	MUNGER, TOLLES & OLSON LLP 560 Mission Street, 27th Floor
15	San Francisco, CA 94105-3089 Telephone: (415) 512-4000
16	Facsimile: (415)512-4077
17	Rose L. Ehler (State Bar No. 296523) Rose.Ehler@mto.com
18	Victoria A. Degtyareva (State Bar No. 284199)
19	Victoria.Degtyareva@mto.com Ariel T. Teshuva (State Bar No. 324238)
20	Ariel.Teshuva@mto.com MUNGER, TOLLES & OLSON LLP
	350 South Grand Avenue, 50th Floor Los Angeles, CA 90071-3426
21	Telephone: (213) 683-9100
22	Facsimile: (213) 687-3702
23	Lauren A. Bell, <i>pro hac vice</i> Lauren.Bell@mto.com
24	MUNGER, TOLLES & OLSON LLP 601 Massachusetts Ave., NW, Suite 500 E
25	Washington, D.C. 20001-5369 Telephone: (202)220-1100
26	Facsimile: (202) 220-2300
27	Attorneys for Defendant Snap Inc.
28	

ATTESTATION I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto. Dated: February 21, 2025 /s/ Brian M. Willen Brian M. Willen